

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

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In re: : Chapter 15  
: Case No. 18-11094 (SCC)  
PERFORADORA ORO NEGRO, S. DE R.L. : (Jointly Administered)  
DE C.V., *et al.*, :  
Debtors in a Foreign Proceeding. :  
:----- x  
GONZALO GIL-WHITE, PERSONALLY : Adv. Pro. No. 19-01294  
AND IN HIS CAPACITY AS FOREIGN :  
REPRESENTATIVE OF PERFORADORA :  
ORO NEGRO, S. DE R.L. DE C.V. AND :  
INTEGRADORA DE SERVICIOS :  
PETROLEROS ORO NEGRO, S.A.P.I. DE :  
C.V., :  
Plaintiff, :  
-against- :  
ALP ERCIL, *et al.*, :  
Defendants. :----- x

**[PROPOSED] ORDER GRANTING JOHN FREDRIKSEN'S  
MOTION TO DISMISS THE COMPLAINT WITH PREJUDICE**

Upon consideration of John Fredriksen's Motion to Dismiss the Complaint With Prejudice (the "Motion to Dismiss") and all other papers filed by the parties in support of and in opposition to the Motion to Dismiss,

IT IS HEREBY ORDERED that John Fredriksen's Motion to Dismiss the Complaint With Prejudice in this action is GRANTED.

Dated: \_\_\_\_\_  
New York, New York

THE HONORABLE SHELLEY C. CHAPMAN  
UNITED STATES BANKRUPTCY JUDGE